

EXHIBIT B

Christine Coyle

From: gabriela roman <roma1531@gmail.com>
Sent: Tuesday, May 20, 2025 8:12 PM
To: Justin Kaplan
Cc: Christine Coyle; christopheremanuelszabo@gmail.com; khaled_elsisi19@hotmail.com; lwalker3402@yahoo.com; najy123@gmail.com; ryeng2012@gmail.com; luispinos64@yahoo.com; ahmed.m.sharafeldin@gmail.com; marquezsales16@gmail.com; barry.rosner@route22toyota.com; ahmedkhedr5161@gmail.com; inevitablegains@gmail.com; stuartspringfield@gmail.com; chrissy.masters@icloud.com; Amar Agrawal; Douglas Ferguson; Elyse Cohen; Elaine Kussurelis
Subject: Re: Elsis, et al. v. CFT Solutions, LLC, et al. Email 4 of 4

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Dear Mr. Kaplan,

We are in receipt of your May 20, 2025 communication. Please be advised that the Plaintiffs do not recognize the jurisdictional discovery schedule as binding, as our motion to vacate the Magistrate Judge's scheduling order remains pending before District Judge Farbiarz. We have not consented to jurisdictional discovery, and as such, the applicability of Rule 34 is not settled.

We view your threat of sanctions under Rule 37(d)(1) as premature and inappropriate while this matter is unresolved. Any attempt to compel production before a ruling on the pending motion would constitute a further effort to coerce pro se litigants into participation in unauthorized discovery.

We reserve all rights to raise this correspondence before the Court in the event you proceed with a motion to compel while our objections remain pending.

Regards,

The Plaintiffs

On Tue, May 20, 2025 at 2:11 PM Justin Kaplan <justin.kaplan@nelsonmullins.com> wrote:

Good afternoon.

On April 18, 2025, we served Requests for Jurisdictional Production on each Plaintiff in a series of 4 emails. Pursuant to Federal Rule of Civil Procedure 34(b)(2)(A), "[t]he party to whom the request is

directed must respond in writing within 30 days of being served. . .” Each Plaintiff’s deadlines to serve responses was accordingly due yesterday, May 19, 2025.

We have not received responses from any Plaintiff.

Though District of New Jersey Local Rule 37.1(a)(1) limits the obligation to confer to resolve any discovery dispute to counsel of record prior to making a motion related thereto, we are nonetheless attempting to do so here. To that end, please advise when each Plaintiff is available to confer regarding the aforementioned noncompliance with Rule 34. To the extent we do not hear from any particular Plaintiff by close of business on Thursday, May 22, 2025; we will have no choice but to move to compel production from the Court and seek sanctions in accordance with Federal Rule of Civil Procedure 37(d)(1).

Regards,

Justin Kaplan



JUSTIN KAPLAN PARTNER

justin.kaplan@nelsonmullins.com

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From: Christine Coyle <christine.coyle@nelsonmullins.com>

Sent: Friday, April 18, 2025 4:11 PM

To: gabriela roman <roma1531@gmail.com>; christopheremanuelszabo@gmail.com;
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Douglas Ferguson <dferguson@egalawfirm.com>; Elyse Cohen <elyse.cohen@nelsonmullins.com>; Justin
Kaplan <justin.kaplan@nelsonmullins.com>; Elaine Kussurelis <elaine.kussurelis@nelsonmullins.com>
Subject: Elsis, et al. v. CFT Solutions, LLC, et al. Email 4 of 4

Please see Defendants' Request for Jurisdictional Discovery.

Thank you.

Christine



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